REMARKS

The Final Official Action dated August 10, 2007 has been carefully reviewed and the foregoing amendment has been made in response thereto. Prior to entry of the foregoing amendment claims 1-34, 36, 37, 39-42, 44-68, 71 and 73-75 were active in the present application. Claims 45-47, 49, and 51 are objected to as being dependent upon a canceled claim. Claims 1-13, 17-18, 22-34, 36-37, 39-40, 42, 46-47, 49-58, 60, 63-68, 73, and 75 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,108,648 issued to Lakshmi et al. Claim 19-21, 41, 45, 48, 59, 61-62, and 71 stand rejected to under 35 U.S.C. §103(a) as being unpatentable over Lakshmi et al. in view of U.S. Patent No. 6,721,747 issued to Lipkin. Claims 14-16 and 74 have been indicated as allowable if rewritten in independent form, including all limitations recited in base claims and intervening claims.

The foregoing presents amendments to claims 39, 45-47, 49, 51, and 71. Claims 57 and 73 have been cancelled. As amended, claims 45-47, 49, and 51 now depend from claim 39. It is believed that the objection to claims 45-47, 49, and 51 has been overcome by the amendment to these claims. Claim 39 has been amended to include the limitations of cancelled claim 57. Claim 71 has been amended to include the limitation "at least one of said processing directives is an analysis directive."

Rejection of claims 1-13, 17-18, 22-34, 36-37, 39-40, 42, 46-47, 49-58, 60, 63-68, 73, and 75 under 35 U.S.C. §102(e)

The rejection of claims 1-13, 17-18, 22-34, 36-37, 39-40, 42, 46-47, 49-58, 60, 63-68, 73, and 75 under 35 U.S.C. §102(e) as being anticipated by Lakshmi et al. is respectfully traversed. To anticipate a claim, the reference must teach every element of the claim. *See* M.P.E.P. §2131 (8th ed., Rev. 2), at 2100-67. It is not

seen that Lakshmi et al. teaches every element of claims 1-13, 17-18, 22-34, 36-37, 39-40, 42, 46-47, 49-58, 60, 63-68, 73, and 75 of the present application.

The invention recited in claim 1 of the present application is a method for creating and executing an executable workflow. Claim 1 includes the steps of:

selecting discrete coupleable items executable in a computer-implemented workflow environment, wherein the discrete coupleable items encapsulate work associated with activities identified by decomposing the decision-making process; said discrete coupleable items comprising:

a set of executable query directives, each executable query directive defining a query to be run against the collection of data;

a set of executable analysis directives, each executable analysis directive defining an analysis to be performed based on results of a query; and

a set of executable distribution directives; each executable distribution directive defining distribution of information based on an analysis to one or more destinations;

creating an executable workflow by coupling at least one of said executable query directives, at least one of said executable analysis directives, and at least one of said executable distribution directives; and

executing said executable workflow to run said query against said collection of data, perform said analysis based on the results of said query, and distribute the results of said analysis to said one or more destinations.

Lakshimi et al. discloses a system of optimizing the execution of queries on a database management system. The described query optimization system considers the selectivity and cost associated with queries in order to determine an optimum execution plan for the queries. Selectivity and cost information

associated with user-defined functions (UDF) is saved to a database table as described in column 4, lines 39-49, of Lakshmi et al., provided below:

> In the DBMS 100, each UDR has an entry in a system procedure table which contains data such as procedure name, ownership, procedure identification number, mode, return size, data size, code size, number of arguments, specific name, external name, parameter style, language identification, parameter types, variant, client information, iterator, commutator, negator, class, stack requirement, selectivity function (selfunc) and per call cost, among others. The per call cost and selfunc information are used by the optimizer 102 to determine an optimum execution plan for queries.

The excerpt from Lakshmi et al. provided above describes the types of data, including selectivity and cost data, associated with each UDR that is saved in a system procedure table within a database management system (DBMS) 100. Column 4, lines 39-49, of Lakshmi et al. was cited in the Final Official Action of August 10, 2007 as teaching the following elements of claim 1: (1) selecting discrete coupleable items executable in a computer-implemented workflow environment, wherein the discrete coupleable items encapsulate work associated with activities identified by decomposing the decision-making process; (2) said discrete coupleable items comprising a set of executable query directives, each executable query directive defining a query to be run against the collection of data; (3) said discrete coupleable items comprising a set of executable analysis directives, each executable analysis directive defining an analysis to be performed based on results of a query; and (4) creating an executable workflow by coupling at least one of said executable query directives, at least one of said executable analysis directives, and at least one of said executable distribution directives.

The invention recited in claim 1 of the present invention provides for the selection of query directives, analysis directives, and distribution directives to create an executable workflow, whereas Lakshmi et al. describes a process for optimizing the execution of queries. Lakshmi et al. does not teach or suggest, in column, lines 39-49, or elsewhere, a process for selecting discrete coupeable items comprising query directives AND analysis directives AND distribution directives to form an executable workflow. As stated above, Lakshmi et al. discloses a system for optimizing the execution of queries. Lakshimi et al. does not create an executable workflow as described in the present application and recited in claim 1.

Independent claims 36, 37, 39 and 71 each recite, or have been amended to recite, a system or process for creating an executable workflow comprising a query directive, an analysis directive, and a distribution directive.. It is believed that each one of these claims, as well as the remaining claims which depend from independent claims 1 and 39, are patentable over Lakshimi et al. Lakshimi et al., as discussed above, does not teach or suggest a system or process for creating an executable workflow comprising a query directive, an analysis directive, and a distribution directive as described in the specification and recited in each independent claim of the present application.

<u>Rejection of claims 19-21, 41, 45, 48, 59, 61-62, and 71</u>
<u>under 35 U.S.C. §103(a)</u>

The rejection of claims 19-21, 41, 45, 48, 59, 61-62, and 71 under 35 U.S.C. §103(a) as being unpatentable over Lakshimi et al. in view of Lipkin is respectfully traversed. To establish a *prima facie* case of obviousness, at least the following requirements must be met: (1) the references when combined must teach or suggest all elements of the claimed subject matter; (2) there must be some motivation, suggestion or teaching to combine the references; and (3) there must

be, within the references, a reasonable expectation of success. *See* M.P.E.P. § 2143 (8th ed., Rev. 2), at 2100-129. The Office has not established a *prima facie* case of obviousness because these requirements have not been satisfied.

Lakshimi et al was cited as teaching most of the limitations of claims 19-21, 41, 45, 48, 59, 61-62, and 71 except for the use of XML to store results. Lipkin was cited as teaching the use of XML to store results. Lakshmi et al., as discussed above, does not teach or suggest a system or process for creating an executable workflow comprising a query directive, an analysis directive, and a distribution directive as described in the specification and recited in each independent claim or the present application. Lipkin, which was cited as teaching the use of XML to store results, also does not teach or suggest a system or process for creating an executable workflow comprising a query directive, an analysis directive, and a distribution directive as described in the specification and recited in each independent claim or the present application. Accordingly, it is believed that claims 19-21, 41, 45, 48, 59, 61-62, and 71 each recite an invention which is patentable over Lakshmi et al. and Lipin, taken singularly or in combination, as each of these claims recites a system or process for creating an executable workflow comprising a query directive, an analysis directive, and a distribution directive.

In view of the foregoing amendments and remarks, it is believed that the present application, including claims 1-34, 36, 37, 39-42, 44-56, 58-68, 71, 74 and 75, is in condition for allowance. Early and favorable action is respectfully requested.

Respectfully submitted,

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